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May 29, 2013

Application GRANTED.

BY EMAIL

The Honorable Jesse M. Furman, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2202
New York, New York 10007

SO ORDERED.


Jesse M. Furman
United States District Judge

May 30, 2013

Re: Defendant Stan Greenberg – Bail Modification Request
United States v. Tokhtakhounov, Case No. 1:13-cr-00268 (JMF)

Dear Judge Furman:

I am counsel for Stan Greenberg in the above matter, who is currently under house arrest. I have conferred with Assistant United States Attorney Joshua Neftalis, as well as Jennifer Powers and Erika DiPalma of Pretrial Services seeking a modification of Mr. Greenberg's release status. I write to Your Honor with their consent to seek the modification requested below.

In short, we respectfully request that you order a termination of the house arrest status of Mr. Greenberg, and in its place that Mr. Greenberg be given a curfew, with the appropriate hours to be determined by Pretrial Services, and with continued wearing of the ankle bracelet. No modification of his travel area restrictions (currently limited to the Southern and Eastern Districts of New York and the District of New Jersey) is sought.

At the time of his arrest, Greenberg was working as a loan officer for Guaranteed Home Mortgage Company, Inc., at 198 Route 9 North, Suite 202, Manalapan N.J. 07726. I have spoken with his supervisor, who indicates that Mr. Greenberg can return to that employment so long as he has no criminal convictions. The requested modification would permit Mr. Greenberg to return to work, do such travel within New Jersey and New York City as his work may require, and engage in other lawful activities such as food shopping, utilizing a gym and visiting his parents.

I am informed that Mr. Greenberg has met the prior conditions for his release, provided co-signers for his bond, and has complied with the terms of his release to date.

Respectfully submitted,



Roger K. Marion, Esq.
Attorney for Defendant Stan Greenberg

cc: Joshua Neftalis, A.U.S.A.
Jennifer Powers
Erika DiPalma
All Counsel (*via ECF*)

USDC SDNY
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